

Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certificate for Calendar Year 2009
EB Docket No. 06-36

Name of Company Covered by this Certification: Aventure Communication Technologies LLC

Form 499 Filer ID: 825749

Name of Signatory: Tim Jenkins

Title of Signatory: Chief Operating Officer

February 4, 2009

I, Tim Jenkins, certify that I am COO of Aventure Communication Technologies LLC and acting as an agent of the company, that I have personal knowledge that our Company has established operating procedures that are adequate to ensure its compliance with the rules in Title 47 – Telecommunications, section 64.2001 *et seq.* The attached statement provides a summary of those operating procedures.

The company did not take any actions against data brokers in 2009. The company also does not have any information outside of the publicly available information in the record in this proceeding regarding the processes that pretexters are using to attempt to access CPNI. Aventure has taken steps to prevent against the release of information to pretexters.

Aventure has not received any customer complaints during the 2009 calendar year concerning the unauthorized release of CPNI.



Name of Officer

Officer of Aventure Communications

CUSTOMER PROPRIETARY NETWORK INFORMATION RULES
Annual CPNI Compliance Certificate-Summary of Operating
Procedures

February 4, 2009

The undersigned Tim Jenkins is COO of Aventure Communication Technologies L.L.C. and provides this Certification of CPNI Compliance for 2008 in accord with 47 CFR 64.2009(e).

Our Company has established operating procedures that are adequate to ensure its compliance with the rule in Title 47 – Telecommunications, sections 64.2001 *et seq.*

Furthermore I am certifying that I have personal knowledge of these procedures, that our Company's personnel are trained on these procedures, and that these procedures are in fact ensuring that our Company is in compliance with the rules in Title 47 – Telecommunications, sections 64.2001 *et seq.*

1. I am Tim Jenkins the COO of the Company. My business address is 401 Douglas St., Suite 406, Sioux City, IA 51101.
2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customer's approval for use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use or release CPNI. However, Company Personnel make no decisions regarding CPNI without first consulting with myself or Monica Gossage, the Company's Office Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company has a policy for addressing customer requests for access to their own CPNI.

6. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. The Company maintains these records in its offices for a minimum of one year.
7. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of the supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or the Office Manager regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either the Office Manager or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either the Office Manager or I regarding any proposed use of CPNI.
8. Further, both the Office Manager and I personally oversee the use of opt-in or other approval requirements contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.
9. The Office Manager and I also ensure that the Company enters into confidentiality agreements, as necessary, if it discloses or provides access to CPNI for any purpose.
10. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.
11. The company has procedures in place for notifying applicable law enforcement personnel and customers, as permitted, after discovery of a breach of a customer's CPNI. The Company will maintain a record of all breaches discovered, notifications made to law enforcement and customers, and to the extent possible, dates of discovery and notification of the breach, a description of the CPNI that was subject to the breach, and the circumstances of the breach, for a minimum of two years.

Tim Jenkins, COO
Aventure Communication Technologies L.L.C.
February 4, 2009

 Name of Officer